

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION**

JANE DOES 1-9,

Plaintiffs,

vs.

**COLLINS MURPHY, SHARON
HAMMONDS, BRENDA F. WATKINS,
LIMESTONE UNIVERSITY, MG
FREESITES, LTD., d/b/a
PORNHUB.COM, MG FREESITES II
LTD., MINDGEEK S.A.R.L., MINDGEEK
USA, INC., MG BILLING LTD., and
HAMMY MEDIA, LTD. d/b/a
XHAMSTER.COM, TRAFFICSTARS
LTD., WISEBITS LTD, XHAMSTER IP
HOLDINGS LTD, WISEBITS IP LTD,**

Defendants.

Case No.: 7:20-cv-00947-DCC

**CONSENT MOTION FOR
EXTENSION OF TIME TO FILE A
RESPONSE**

Plaintiffs, by and through their undersigned counsel, and pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure move the Court for an order extending the time within which the Plaintiffs may file a response to Defendants' Motion to Dismiss. (See Dkt. No.233).

This extension is being sought in good faith, for a proper purpose, and is not intended to unduly or unnecessarily delay these proceedings. Upon conferring, counsel for the Defendant consents to allow Plaintiff to extend the time to file a Response by thirty (30) days as long the deadline for Defendant MG Freesites, Ltd's Reply is also extended by thirty (30) days due to a conflict with Defendant's counsel during the first two weeks of January. Plaintiff's current due date is November 28, 2020, and the new due date would be December 28, 2020. Defendant's Reply due date would be January 27, 2023.

This motion is based upon the pleadings filed in this case, rules of Court, and such other matters as may be properly presented to the Court. In accordance with Local Civil Rule 7.04, a full explanation of the motion is contained within this motion and a memorandum will serve no useful purpose.

WHEREFORE, the Plaintiff, respectfully requests this Court grant Plaintiff's Motion and enter an order extending the time in which he may file a Response by an additional thirty (30) days making the new deadline to file December 28, 2022 and making Defendant's Reply deadline January 27, 2023.

HAVING SEEN AND AGREED:

/s/ J. Edward Bell, III

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/s/ Mark Goddard (with permission)

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